



Florida Tropical Fish Farms Association, Inc.

DEPARTMENT OF TRANSPORTATION
OFFICE OF THE SECRETARY

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209706
December 17, 2002

Docket Management System
U.S. Department of Transportation, Room Plaza 401
400 Seventh Street, SW
Washington, DC 205990-0001

RE: Docket Number FAA-2002-13378 — 3343

Dear Sir or Madam:

As President of the Florida Tropical Fish Farms Association, an organization representing nearly 400 members involved in the production of freshwater aquarium fish, I would like to take this opportunity to advise you of our industry's position and concerns on the proposed rule regarding NPRM on Reports by Carriers on Incidents Involving Animals During Air Transport.

We are concerned with several elements of the proposed rule that could have a very adverse impact on the shipment of tropical fish and other companion pets.

It is our understanding that the intention of Congress was to enact legislation regarding the safe air transport of pets to apply only to animals that are checked as baggage. The act is not to regulate animals shipped as general cargo which is how all tropical fish shipments are classified.

It is not clear what species the definition of "animal" is intended to define. It is our belief that "animal" should be defined in this rule as only dogs and cats which are typically transported by their owners as checked baggage.

The proposed 15-day period for filing of loss reports is not a reasonable amount of time. We suggest a time frame of 30 to 45 days for filing such reports with the FAA.

Our industry is dependent upon the nation's airlines for getting our product to the marketplace. On a weekly basis, approximately 10,000 to 12,000 boxes of tropical fish are shipped from Florida to destinations throughout the United States with a very negligible amount of loss. We are concerned about the added cost that the airlines would pass on to anyone shipping animals, including tropical fish shipments, as a result of this proposed rule. The economic impact to our industry could be very severe as air cargo freight charges are already expensive and we certainly don't need another reason for the airlines to raise their freight rates.

We do hope you will take these comments in consideration by enacting a rule that is consistent with the original intent of Congress.

Sincerely,

Art Rawlins

Art Rawlins
President

AR/nt

cc: Marshall Meyers